

The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

WILLIAM T. WHITMAN, individually and on) NO. 3:19-cv-06025-BJR
behalf of all others similarly situated,)

Plaintiff,)

vs.)

STATE FARM LIFE INSURANCE)
COMPANY,)

Defendant.)

**DECLARATION OF NORMAN E. SIEGEL IN
SUPPORT OF PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

1 I, Norman E. Siegel, declare:

2 1. I am a founder and partner at the law firm of Stueve Siegel Hanson LLP, counsel of
3 record for Plaintiff and the putative class in the above-captioned matter. I am admitted pro hac vice to
4 appear and participate in this case. I make this declaration of my own personal knowledge. If called to
5 testify, I could and would competently testify to the following:

6 ***Stueve Siegel Hanson Is Adequate to Represent the Class***

7 2. I have been a member of the Missouri bar since 1993 when I obtained my J.D. from
8 Washington University School of Law in St. Louis, Missouri where I served as an Editor of the *Journal*
9 *of Urban Contemporary Law*. Prior to starting Stueve Siegel Hanson in 2001, I served as an Assistant
10 Attorney General for the state of Missouri and as a partner of the law firm currently named Dentons.

11 3. Over 25 years of practice I have been recognized by my peers as one of the top
12 commercial trial lawyers in the country and have recently prosecuted complex business cases including
13 class actions against some the largest businesses in the world including Equifax, Experian, Union
14 Pacific Railroad, Kinder Morgan, Intuit, Home Depot, Target, U.S. Bank, John Hancock, and H&R
15 Block. I have served as trial, class, and appellate counsel in a wide variety of complex commercial
16 cases, representing both plaintiffs and defendants.

17 4. I was recently named by *The Best Lawyers in America*® as a “Lawyer of the Year” for
18 class action litigation and have been named by *Best Lawyers* as a Tier 1 practitioner in three practice
19 areas including commercial litigation and class actions. I have been elected a Missouri & Kansas Super
20 Lawyer (Top 100 List), and have been named “Best of the Bar” and a “Kansas City Newsmaker” by the
21 Kansas City Business Journal. I was also named to Lawdragon Magazine’s 500 Leading Plaintiffs’
22 Lawyers in America, and named a “Local Litigation Star” by *Benchmark Plaintiffs*. I am rated AV – the
23 highest designation a lawyer can achieve from publisher Martindale-Hubbell.

5. Stueve Siegel Hanson has 24 lawyers and 10 staff members located in Kansas City, Missouri. The firm has sufficient financial and personnel resources to litigate this case to final judgment. Moreover, the firm, along with Miller Schirger, has successfully litigated cases of the type at issue here, including trying a case against State Farm Life Insurance Company, the defendant here, resulting in a jury verdict of over \$34 million on behalf of the class of approximately 24,000 policyholders for the same claims at issue in this case. *See Vogt v. State Farm Life Ins. Co.*, Case No. 2:16-cv-04170-NKL, Dkt. 358 (W.D. Mo. June 6, 2018), *aff'd* 963 F.3d 753 (8th Cir. 2020). The firm (together with Miller Schirger) is also simultaneously prosecuting six additional cases against State Farm making the same claims as those here in federal district courts in California, Minnesota, Florida, Arizona, Oregon, and Texas, as well as similar cases against USAA Life Insurance Company, Connecticut General Life Insurance Company, and Kansas City Life Insurance Company. Additionally, Stueve Siegel Hanson with Miller Schirger has secured settlements on behalf of 77,000 policyholders against Lincoln National Life Insurance Company providing additional death benefits valued at \$2.25 billion, with a market value of approximately \$171.8 million (*see Bezich v. The Lincoln Nat. Life Ins. Co.*, No. 02C01-0906-PL-73 (Allen Co., Ind.)), and nearly \$60 million on behalf of approximately 90,000 John Hancock Life Insurance Company policyholders (*Larson v. John Hancock Life Ins. Co.*, No. RG16813803 (Alameda Co., Cal.)).

6. I have been appointed class counsel and represented clients in dozens of class actions in state and federal courts across the country. My firm has substantial experience handling large, complex class litigation, including not just settling such cases but also trying the cases to final judgment. Examples of my firm's experience, along with the brief résumés of the attorneys at Stueve Siegel Hanson working on this case, are included in the firm résumé of Stueve Siegel Hanson LLP, attached hereto as Exhibit A.

